

BRIAN P. KETCHAM, ESQ.
52 DUANE STREET, 7TH FLOOR
NEW YORK, NEW YORK 10007
(212) 518.6380
WWW.KETCHAMPLLC.COM

October 29, 2024

BY ECF

Hon. Jennifer L. Rochon
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Keith Taylor*
24-cr-00524 (JLR)

Dear Judge Rochon:

I represent defendant Keith Taylor in the case referenced above and write to request a modification of the current pretrial briefing schedule.

Mr. Taylor appeared before Your Honor on September 6, 2024 for an initial conference. At the conference, the Court set the following briefing schedule: substantive defense motions to be filed by October 31, 2024, government opposition to be filed by November 15, 2024, and defense reply to be filed by November 15, 2024.

The government timely produced discovery pursuant to Fed. R. Crim. P. 16. The discovery produced to date is voluminous and contains, *inter alia*, thousands of pages of bank account and tax records. In addition, the defense has been working with the U.S. Attorney's Office to resolve some technical issues the defense has had in accessing the production of data contained on Mr. Taylor's mobile phone. I have made best efforts to expeditiously review the Rule 16 material but require additional time to complete that review (as well as review the mobile phone data when I am able to access it) and determine what motions, if any, would be appropriate in this case.

After conferring with counsel for the government, I respectfully request that the motion schedule be modified as follows: defense motions to be filed by December 2, 2024, government opposition to be filed by December 18, 2024, and defense reply to be filed by January 2, 2025. This proposed revised schedule takes account for the holiday period in late December. The government has no objection to this proposed modified briefing schedule.

Should this request be granted, the parties request that the status conference currently scheduled for January 8, 2025 be continued to sometime during the week of February 3,

2025 that is convenient for the Court. The Court previously excluded speedy trial time from September 6, 2024 through January 8, 2025. Should this request be granted, Mr. Taylor has no objection to an additional period of excludible speedy trial time through the week of February 3, 2025 for the purpose of ongoing review of discovery and the submission of substantive motions.

I thank the Court for considering this request.

Respectfully submitted,

/s/Brian P. Ketcham
Brian P. Ketcham

Cc: AUSAs Rebecca Delfiner and Eli Mark (via ECF)